

December 7, 2016

Hon. A. Kathleen Tomlinson
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: *US v. Jason Jones*, 16-mj-874

Dear Judge Tomlinson:

I understand that my associate, Harleigh Tensen, was asked to appear before you today by AUSA Bradley King to waive speedy trial time for our client, Jason Jones. While Mr. Jones is familiar with Ms. Tensen, we did not seek leave in advance for Ms. Tensen to appear before the Court, as required by the CJA Plan for this District.

By way of explanation, I was on trial from October 31 to November 22 before Judge Engelmayer in the Southern District and immediately thereafter had to prepare for the trial I am now engaged in before Judge Spatt, which began on December 6. On December 1, AUSA King emailed to ask if we could meet concerning Mr. Jones. He did not mention at that time that he was anticipating a court appearance. Working in the best interests of Mr. Jones, I asked Ms. Tensen to attend the meeting, rather than wait until I had a break in the trial. It was only at the meeting this afternoon that Mr. King asked Ms. Tensen to appear in court. Ms. Tensen would not have appeared before you had Mr. King not asked her to at the meeting and had I not been engaged before Judge Spatt.

I had not intended to bill for the meeting. However, as Ms. Tensen did appear before you, I would now ask the Court to appoint her to the case at an appropriate hourly rate, *nunc pro tunc* to December 7, 2016, so that her position is clear with the Court and the CJA clerk. She has worked with me for over two years on numerous federal matters, has second-chaired a trial in the Southern District with me, and is an intelligent and conscientious member of the Eastern District bar. She is a graduate of Franklin & Marshall and New York Law School.

Thank you for your consideration.

Respectfully submitted,



Peter E. Brill